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June 9, 2005

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Telecommunications Services Inside Wiring, Customer Premises Equipment CS Docket No. 95-184; Implementation of the Cable Television Consumer Protection and Competition Act of 1992: Cable Home Wiring MM Docket No. 92-260

Dear Ms. Dortch:

Today, June 9, 2005, Leora Hochstein, Will Johnson, Mahasti Pourdastan, Rip Van Roekel, and Kelley Dunne of Verizon met with Bill Johnson, Deborah Klein, John Norton, Karen Kosar, John Kiefer and Alison Greenwald of the Media Bureau to discuss the costs and difficulty associated with accessing cable wiring located behind sheetrock in a multiple dwelling unit ("MDU").

Verizon discussed its positions as set forth in the Verizon Comments filed in the above proceeding. In addition, Verizon discussed the attached presentation, which includes cost data associated with cutting through sheetrock in an MDU for the purpose of accessing cable wiring.

Consistent with Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the above-referenced proceedings.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leora Hochstein".

Attachment

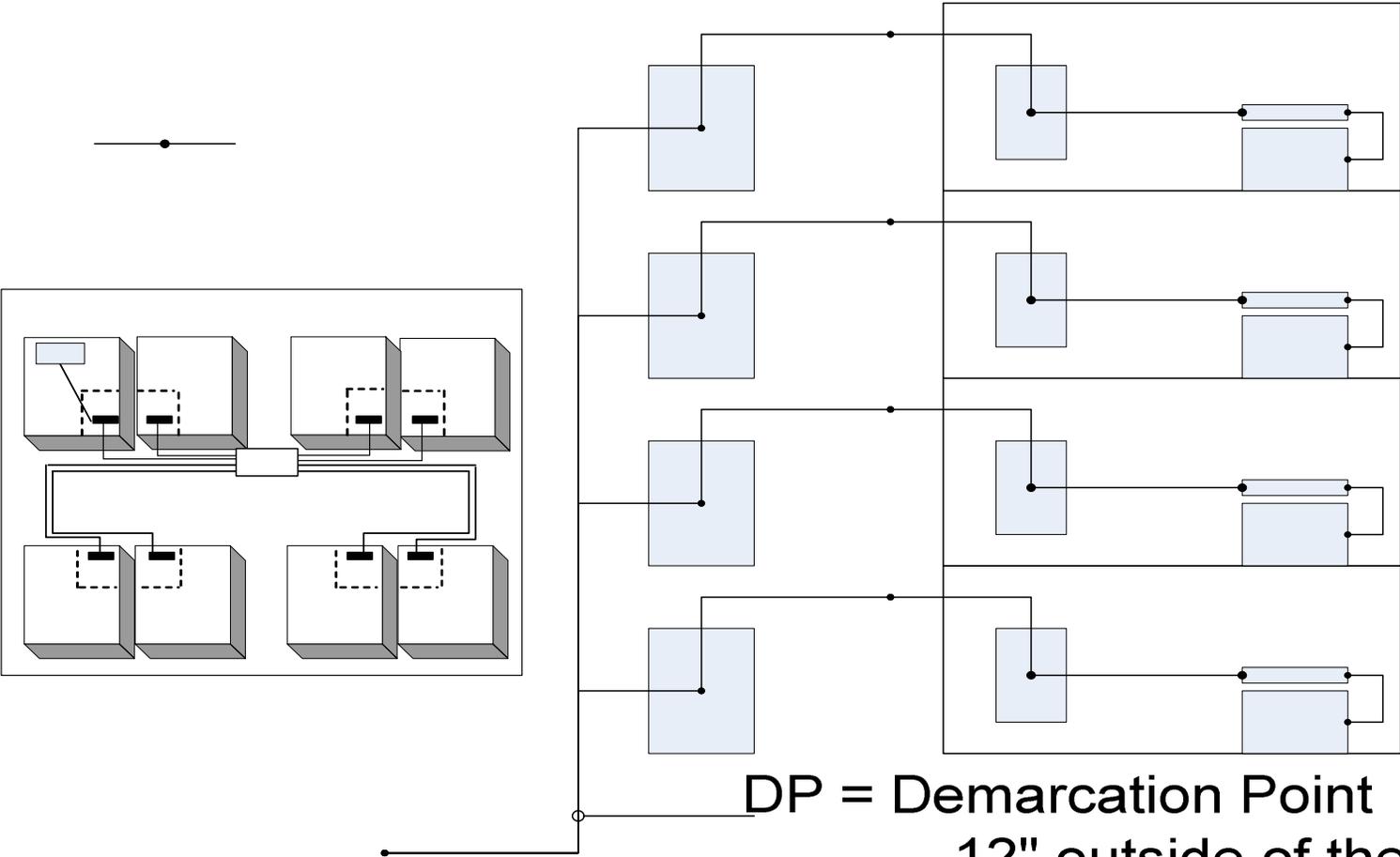
cc: Bill Johnson
Deborah Klein
John Norton
Karen Kosar
John Keifer
Allyson Greenwald



*The Accessibility of Cable Home Wiring
Behind Sheetrock Walls and Ceilings*

June 9, 2005

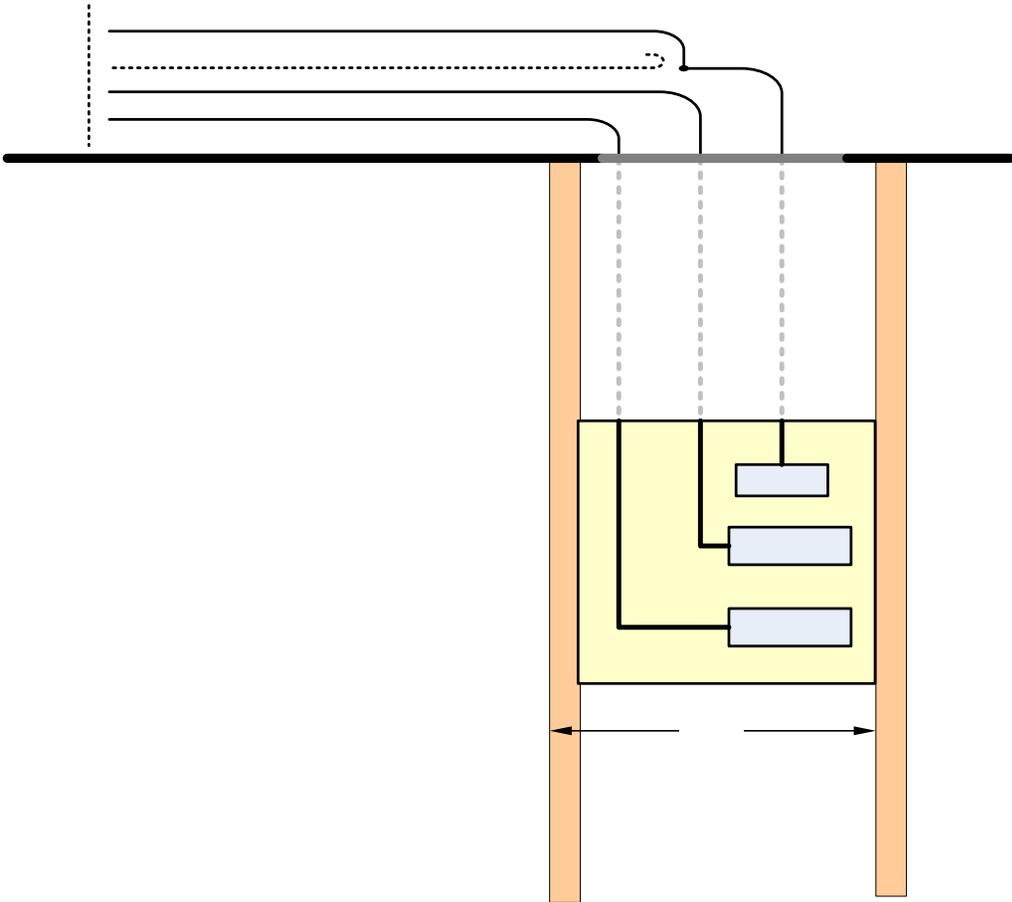
Cable Home Wiring Diagram—Floor Plan



DP = Demarcation Point
12" outside of the living unit

VT = Video Tap
Point where cable becomes c

Cable Home Wiring Diagram



Costs of Accessing Demarcation Point behind Sheetrock

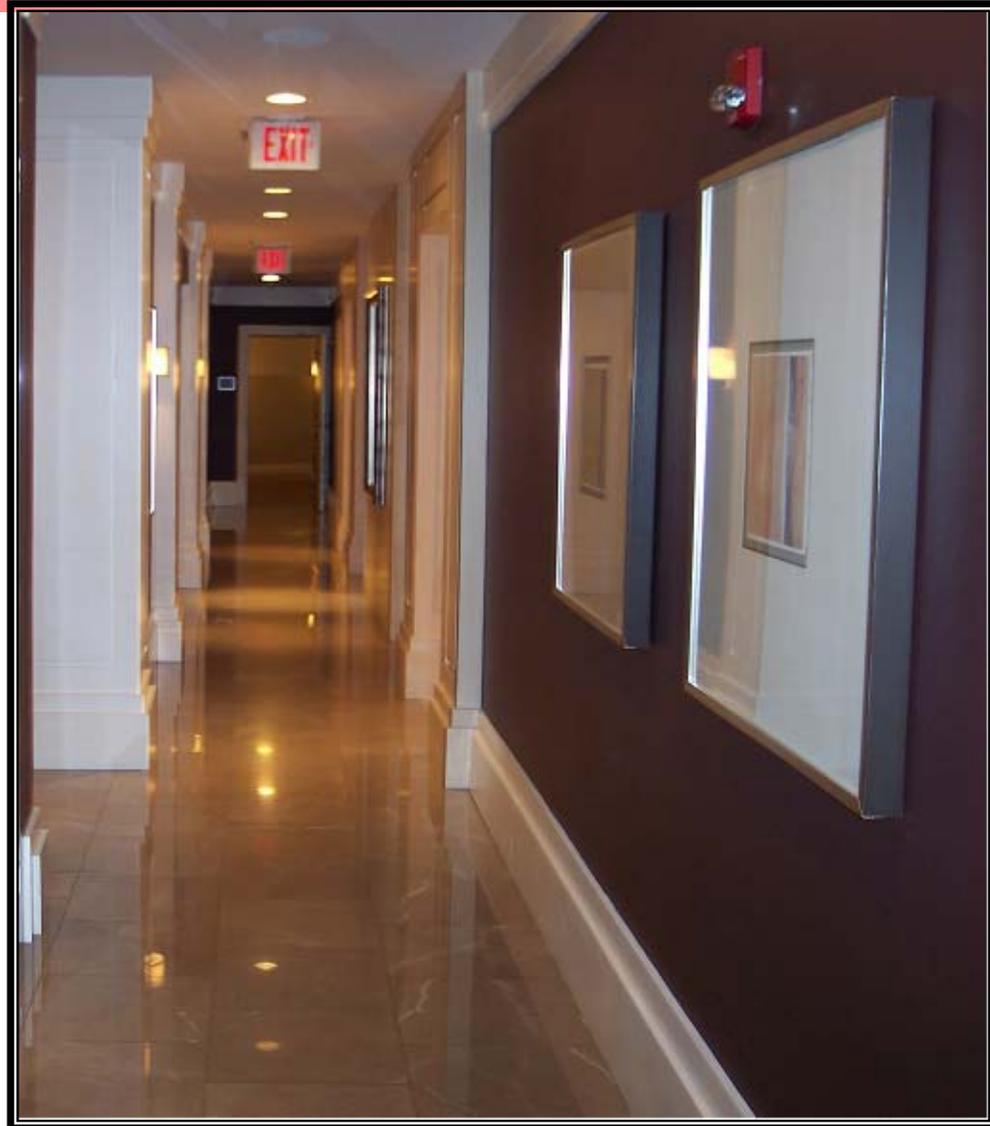


- **Accessing wiring behind sheetrock requires significant modifications and/or damage to preexisting structural elements and leads to significant costs including:**
 - **Cable Locating Process:** Locate the wire behind wall or ceiling (site review, engineering, use of tone locating equipment, etc): \$30.00 per living unit.
 - **Hole Opening Costs:** Opening sheetrock to access wire (ceiling, floor, or wall): \$20.00 per opening
 - **Restoration of sheetrock:** \$200-\$1000 per living unit which includes multiple visits to:
 - close openings
 - tape
 - apply mud coating
 - sand
 - paint (wallpaper, faux finish, customer paneling, etc in many cases would be additional costs)

*Difficulty and Expense Varies by:
MDU—Example #1*



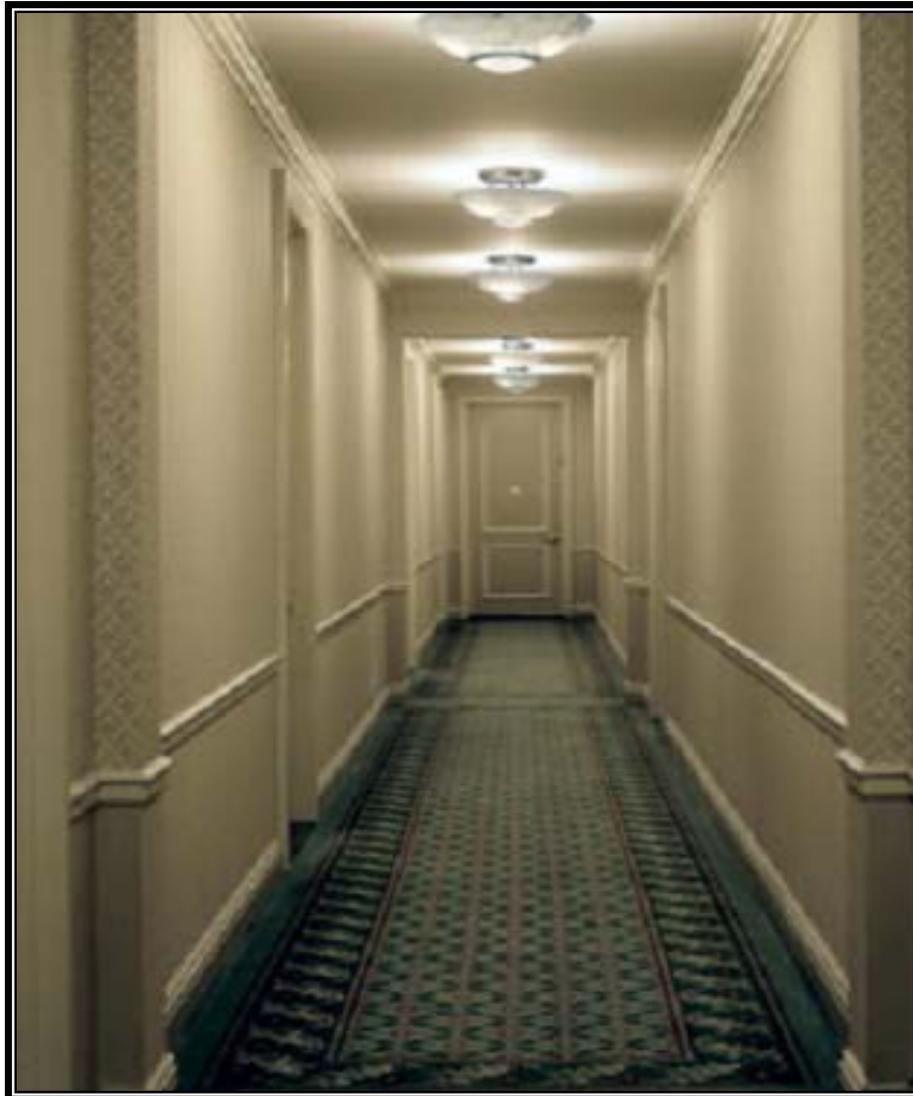
- Plain Ceiling
- Painted Wall
- No Carpet



MDU—Example 2



- Plain Ceiling
- Wallpaper
- Carpet
- Crown molding



MDU—Example # 3



- Intricate ceiling and walls
- Trim and molding
- Carpet



MDU Owner's Reluctance and Requirements



- Most MDU owners won't permit access.

- Common MDU owners' concerns:
 - Disturbance to residents.
 - Safety considerations.
 - Pathway generations.
 - Property restoration.

Conclusions



- Going behind sheetrock -- a pre-existing structural element -- in order to access wiring is costly, disruptive and most often times simply not permitted.
- As a practical matter, competitive video providers have no access to wiring behind sheetrock given both the costs and the unwillingness of MDU owners to permit such access.
- Adopting a rule that a demarcation point cannot be located behind a wall or ceiling will facilitate competition among video service providers for MDU customers.